



LOWEY DANNENBERG

July 17, 2023

VIA ELECTRONIC CASE FILING

The Honorable Michael A. Hammer
United States Magistrate Judge
United States District Court for the District of New Jersey
Martin Luther King Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**RE: *In re Revlimid and Thalomid Purchaser Antitrust Litigation,*
No. 19-cv-7532-ES-MAH;**

MSP Recovery Claims, Series LLC, et al. v. Celgene Corp., et al., No. 21-cv-20451-ES-MAH

Dear Judge Hammer,

We represent Plaintiffs Humana, Inc., Cigna Corp., Blue Cross Blue Shield Association, BCBSMN, Inc., Health Care Service Corporation and Blue Cross Blue Shield of Florida, Inc. and write on behalf of all Plaintiffs and all Defendants in these actions. Consistent with Your Honor's June 9, 2023 Order directing the parties to identify their proposed candidates for Special Discovery Master in view of the addition of new parties to the case, in place of the previous submission on this issue (ECF No. 96), the parties submit as follows:

Plaintiffs propose the Honorable Dennis M. Cavanaugh and Defendants propose the Honorable Faith Hochberg. The parties also state that, as noted at ECF 96, they are not in a position at this date to consent to waiver of appellate rights.

We are, of course, available should the Court have any questions.

Respectfully submitted,

Peter D. St. Phillip

cc: Counsel of Record (*via* ECF)

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